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FOUNDED 1866

December 21, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Re: Ex Parte Submission
*Third Periodic Review of the Commission's Rules and Policies
Affecting the Conversion to Digital Television,*
MB Docket No. 07-91

Dear Ms. Dortch:

On December 21, 2007, I spoke on the phone with Eloise Gore, of the Media Bureau on behalf of Tribune Broadcasting and Gannett. We discussed the Commission's 0.5 percent interference protection standard and MSTV's current proposal to afford stations returning to their analog channels a one-year period of relief from the interference protection standard.

I indicated that both Tribune and Gannett were primarily interested in modifying certain Third Periodic policies to provide long term, permanent solutions to various coverage area issues that have arisen. The single most important issue in the Third Periodic DTV NPRM for Tribune and Gannett was changing the proposed 0.5 percent interference standard to an incremental standard that allowed stations to cause 0.5 percent new interference to surrounding stations above the level of interference already caused by the station's allotment.

The second item of priority in the Third Periodic NPRM for Tribune and Gannett was to convince the Commission to process minor modification applications proposing service area increases as soon as possible. While both companies recognize that there are staffing, resource and logistical issues that must be addressed before the Media Bureau staff can process these applications, the sooner these applications can be processed, the sooner antenna orders can be placed and the sooner stations can build-out their improved service areas.

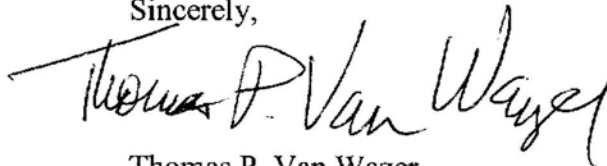
We also discussed MSTV's proposal to allow stations returning to their analog channels to operate for the first year after February 17, 2009 with facilities that exceed their digital allotments, provided that the transitional DTV operation does not cause in excess of 2 percent incremental interference to any neighboring station. I explained that both Tribune and Gannett would welcome the temporary flexibility this proposal would provide. Given the enormous number of factors that will have to come together by February 17, 2009 for those

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stations returning to their analog channels post-transition, additional operating flexibility will undoubtedly be very helpful. At the same time, I also explained that this proposal was not a high priority for either company because it was not a long term solution to the coverage issues faced by various Gannett and Tribune stations. I indicated that the expected processing of the various Petitions for Reconsideration of the 7th Report & Order in MB 87-268 filed by Tribune and Gannett and the proposed change to the 0.5 percent interference standard would provide the long term relief that was most important to both companies.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, reading "Thomas P. Van Wazer". The signature is fluid and cursive, with the first name "Thomas" and last name "Wazer" being more prominent.

Thomas P. Van Wazer

cc: Eloise Gore